Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Deployment of Wireline Services Offering	)	CC Docket No. 98-147
Advanced Telecommunications Capability	)	
	)	

REPLY COMMENTS OF SBC COMMUNICATIONS INC.
REGARDING VERIZON POT BAY PROPOSAL

SBC Communications Inc. ("SBC") submits these Reply Comments pursuant to the Public Notice (DA 02-506) released in this proceeding on March 4, 2002. SBC generally agrees with Verizon as to the benefits of POT bays,[1] and SBC encourages the Commission to clarify that a POT bay is permissible under its rules. SBC is concerned, however, that AT&T is misconstruing this issue in an effort to gain direct access to ILEC networks in general, and ILEC main distribution frames in particular. SBC requests that the Commission hold fast to its protection of ILEC main distribution frames from direct access by anyone other than the ILECs and their vendors.[2]

When one network interconnects with another, there must a clear demarcation between the two networks. SBC offers, as an option, POT bays. SBC also allows direct cabling

[1] *See, e.g., Verizon Comments* at 6-9.

[2] As an initial matter, AT&T is incorrect that SBC refuses to use POT bays. In fact, SBC installs and uses a POT bay at the request of a CLEC, and nearly 70% of collocating CLECs in SBC's territory do, in fact, use POT bays. AT&T also complains that CLECs are at the mercy of "ILEC-selected vendors," who "look to the ILECs for payment." *AT&T Comments* at 3, 4. This is simply not true with respect to SBC, which actively promotes its Customer Does Own Work ("CDOW") collocation process, in which the CLEC is responsible for hiring, controlling and paying its vendors for collocation provisioning. Indeed, it is ironic that AT&T would complain in this proceeding of "ILEC-selected vendors" in light of AT&T's active opposition to SBC's CDOW offerings.

connections in a CLEC's collocation space. In either case, a well-defined demarcation point is beneficial to allocate engineering, maintenance, and repair responsibilities to the ILEC and CLEC on their respective networks. A POT bay, though not necessary, also establishes a convenient test point for determining whether a trouble lies on the ILEC or CLEC side of the respective networks.

POT bays strike the appropriate balance of fulfilling these requirements while also ensuring the proper security of both networks. Moreover, because the connections are pre-wired to a single location on both the ILEC and CLEC side, a POT bay provides an efficient and cost effective means of demarcation.

Indeed, even AT&T concedes that use of POT bays "may be a reasonable practice."[3] The real focus of AT&T in its Comments thus seems to be ILEC collocation equipment and procedures, rather than use of a POT bay *per se*. SBC, in collaboration with CLECs, has developed a "best in class" set of POT bay equipment, which includes a standard panel manufactured by ADC.[4] That panel allows AT&T--and any other CLEC that chooses to use a POT bay--to terminate, access, and test discrete pairs on the CLEC side of the POT bay.[5] Moreover, SBC's collocation installations, whether POT bay or direct cabling, are performed within the quality and timeframe requirements set forth in its contracts and tariffs.[6] If AT&T has concerns about SBC's practices or equipment, AT&T should address those concerns directly to SBC. It would be inappropriate, however, to eliminate the use of POT bays, or to contravene the

[3] *AT&T Comments* at 1.

[4] Thus, SBC does not use amphenol connectors or Krone blocks as suggested by AT&T. *See AT&T Comments* at 1, 5-6.

[5] It does not appear, therefore, that the testing concerns raised by AT&T apply to POT bays in SBC territory.

[6] AT&T complains that the location of a POT bay may eliminate its benefits. *AT&T Comments* at 6. SBC locates POT bays as close as technically possible to a CLEC's collocation space.

fundamental purpose of POT bays (*i.e.,* demarcating engineering, maintenance, testing, and repair responsibility) based upon the unsupported assertions raised by AT&T in this proceeding.

AT&T specifically requests access to the "punch down side" of POT bays.[7] There is no justification for such a request. Although AT&T does not specify precisely what it means by "punch down side," it would appear that AT&T desires direct access to some point on an ILEC's network. The purpose of a POT bay, however, is to establish the demarcation point of responsibility for maintaining the respective networks. By definition, the "punch down side" of the POT bay is the responsibility of the ILEC, and if AT&T has concerns about SBC end-to-end circuit testing or facilities assignment on the SBC side of POT bays, then AT&T should address those concerns to SBC.

In no case, however, should AT&T be able to gain access to ILEC main distribution frames under the guise of the concerns raised in its Comments. SBC requests that the Commission affirm the use of a POT bay as reasonable and reject any suggestion that AT&T or any other CLEC should have direct access to ILEC main distribution frames.

Respectfully submitted,

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[7] *See, e.g., AT&T Comments* at 6-7.